

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America
Plaintiff,

Docket No. 1:24-cr-3

v.

Alton Ryan,
Defendant

MOTION TO CONTINUE/GOVERNMENT ASSENTS

Alton Ryan moves to continue his jury selection and trial, which is presently scheduled for September 17, 2024. He seeks an extension of eighty-three (83) to one-hundred twenty-five (125) days, which would place this case on the court's docket for December 10, 2024, or January 22, 2025.¹

As grounds, Mr. Ryan states:

1. He is charged with conspiracy to distribute a controlled drug. Trial is scheduled for September 17, 2024.
2. Mr. Ryan has had discussions with the Government about his case, which are ongoing. At the same time, Mr. Ryan is engaging in

¹ This court appears to be on the trial calendar for December 10 and January 22. Counsel would have sought a ninety (90) day extension were it consistent with the calendar. Any extension from 83-125 days is acceptable.

rehabilitation that may impact the discussions. He has completed the FOCUS program at the state prison and has been recommended for entry into the Therapeutic Community at the Strafford County House of Corrections but has not yet entered the program. He wishes to continue the trial in part so that he may have adequate time and opportunity to concentrate on treatment for his substance use disorder.

3. The Government assents. Also assenting, through counsel, are defendants Demarco, Conway, Cantave, Hull, Raiche, Schnell, Conley, and Drew.²

4. Pursuant to Local Rule 12.1(d), defense counsel has consulted with Mr. Ryan about the requested continuance, and explained to him that, by seeking a continuance, he is waiving his constitutional and statutory rights to a speedy trial; he has personally assented to the continuance, and defense counsel will deliver a copy of this motion to Mr. Ryan this week.

WHEREFORE, Mr. Ryan requests that this court grant his motion to continue his trial for up to 125 days.

² Counsel for these defendants contacted the undersigned and indicated that their clients join in Mr. Ryan's request for a continuance.

Respectfully submitted,

ALTON RYAN

By his attorney,

ROTHSTEIN LAW LLC

By: /s/ David M. Rothstein
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CERTIFICATE OF SERVICE

I certify that I have served a copy of this motion on the Assistant United States Attorney this 29 day of July, 2024, via ECF.

/s/ David M. Rothstein
David M. Rothstein